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July 30, 2008

Hon. Victor Marrero
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St., Room 660
New York, NY 10007

USDS SDNY
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Re: Rodriguez v. Quarantillo, et al., 07 Civ. 9635(VM)
JOINT REQUEST FOR ADJOURNMENT OF THE 8/1/2008 CONFERENCE

Dear Judge Marrero:

A pre-trial conference for the instant case is scheduled to take place before your Honor this Friday, August 1, 2008, at 9:45 A.M. At this time, the parties jointly move the Court to adjourn the upcoming conference in light of the fact that settlement in this case is near completion. The instant adjournment request is the second adjournment request by either party in this case. The Court granted the first adjournment request by the Government due to schedule conflict, which was unopposed.

Except for the Petitioner's deposition, discovery in this case, including responses to interrogatories and production of documents by both parties, have been completed. No further discovery is needed in the instant case. The instant adjournment request is necessary because Petitioner's deposition will take place tomorrow, Thursday, July 31, 2008, at 10:30 A.M., one day before the upcoming conference.

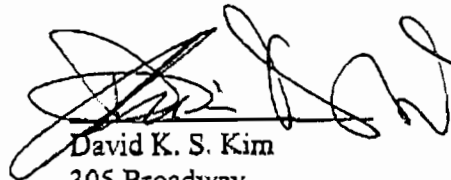
The aforementioned deposition could not have been scheduled earlier due to scheduling conflicts among the Petitioner, the undersigned counsel and Mr. Shane Cargo, Assistant United States attorney, attorney for the Respondents, as well as the additional time needed to prepare and submit responses to document requests.

Mr. Cargo has indicated to the undersigned counsel that, absent any unforeseen developments following the deposition, he intends to recommend approval of the Petitioner's naturalization application to the Respondent U.S. Citizenship and Immigration Services ("USCIS"). Mr. Cargo expects to receive a final decision from the USCIS within the next 60 days upon submission of his recommendation to the USCIS.

Based on the foregoing, it is respectfully requested that the August 1, 2008, conference be adjourned for at least 60 days or at a later date and time the Court deems proper.

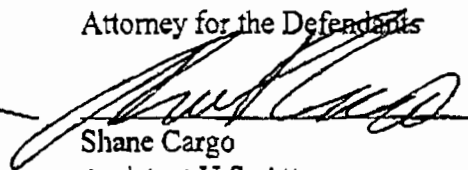
Respectfully submitted,

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So Ordered

United States District Judge

Dated:

Request GRANTED. The <u>next status</u> conference herein is rescheduled to <u>9-29-08</u> at <u>5:00 P.M.</u>	
SO ORDERED.	
<u>7-31-08</u> DATE	 VICTOR MARRERO, U.S.D.J.